

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
ROSINA DENISE COOK)	Case No. 16-32472-KRH
)	Chapter 13
Debtor)	

**MOTION TO EXPEDITE HEARING ON AMENDED
MOTION TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Amended Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on May 16, 2010.
2. The Debtor has applied for and Movement Mortgage, LLC has approved a loan to the Debtor in the amount of \$378,826.00 plus interest at 3.625% per annum to be repaid with 360 equal monthly payments of \$2,296.00 for the refinancing of the loan on her home located at 8902 Mansfield Woods Drive, Henrico, VA 23231. The closing costs are to be paid by the Debtor.
3. The refinancing of the loan is in the best interest of the Debtor and will facilitate her ability to perform under her Chapter 13 Plan filed herein.
4. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on the Amended Motion to Incur Debt, Shorten the Notice Period required for said Motion, and grant such other and further relief as is just and proper.

Dated: May 27, 2020

ROSINA DENISE COOK

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE: _____)
)
ROSINA DENISE COOK) Case No. 16-32472-KRH
) Chapter 13
Debtor)_____

NOTICE OF MOTION AND HEARING

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to the Amended Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **June 3, 2020 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: May 27, 2020

ROSINA DENISE COOK

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
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/s/ James E. Kane
Counsel for Debtor

Capital One Auto Finance c/o AIS Portfolio S
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Henrico County, Virginia
HENRICO CONTY
P.O. BOX 90775
HENRICO, VA 23273-0775

United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219-1888

AMCA
P.O. Box 1235
Elmsford, NY 10523-0935

Account Control Systems, Inc.
85 Chestnut Ridge Rd.
Suite 113
Montvale, NJ 07645-1836

Ashley Funding Services, LLC its successors
assigns as assignee of Laboratory
Corporation of America Holdings
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Bon Secours Memorial Regional Med Ctr
c/o Patrick F. Heinen, Esq.
Spinella, Owings & Shaia, P.C.
8550 Mayland Dr.
Richmond, VA 23294-4704

Bureaus Investment Group Portfolio No 15 LLC
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk VA 23541-1021

Bureaus Investment Group Portfolio No 15 LLC
c/o Recovery Management Systems Corp
25 SE 2nd Avenue Suite 1120
Miami FL 33131-1605

COUNTY OF HENRICO, VIRGINIA
ANDREW R. NEWBY
ASSISTANT COUNTY ATTORNEY
P.O. BOX 90775
HENRICO, VIRGINIA 23273-0775

Capital One
Po Box 30285
Salt Lake City, UT 84130-0285

Capital One Auto Finance
7933 Preston Rd
Plano, TX 75024-2302

Capital One Auto Finance, a division of Capi
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Capital One Auto Finance, c/o Ascension Capi
P.O. Box 201347
Arlington, TX 76006-1347

Capital One Bank (USA), N.A.
PO Box 71083
Charlotte, NC 28272-1083

Comenity Bank/Victoria Secret
Po Box 18215
Columbus, OH 43218-0000

Commonwealth of Virginia
Department of Taxation
P.O. Box 2156
Richmond, VA 23218-2156

County of Henrico, VA
PO Box 90775
Dept of Finance
Henrico, VA 23273-0775

Department Store National Bank
c/o Quantum3 Group LLC
PO Box 657
Kirkland, WA 98083-0657

Dr. Overton Wiley Kirchmer
10410 Ridgefield Pkwy.
Henrico, VA 23233-3500

ECMC
PO Box 16408
St. Paul, MN 55116-0408

(c)ECMC
3505 HIGHPOINT DR N
OAKDALE MN 55128-7577

FMS, Inc.
PO Box 707600
Tulsa, OK 74170-7600

Firstsource Advantage, LLC
PO Box 628
Buffalo, NY 14240-0628

(p)FOCUSSED RECOVERY SOLUTIONS
9701 METROPOLITAN COURT
STE B
RICHMOND VA 23236-3690

Ginny's
c/o Creditors Bankruptcy Service
P.O. Box 800849
Dallas, TX 75380-0849

Ginnys/Swiss Colony Inc
1112 7th Ave
Monroe, WI 53566-1364

Glasser & Glasser
580 E. Main St.
Suite 600
Norfolk, VA 23510-2322

Henrico Area Mental Health
10299 Woodman Rd.
Glen Allen, VA 23060-4419

IC Systems, Inc
444 Highway 96 East
Po Box 64378
St Paul, MN 55164-0378

(p) INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

MCV HOSPITAL
P O BOX 980462
RICHMOND, VA 23298-0462

MCV Physicians
PO Box 91747
Richmond, VA 23291-9747

MIDLAND FUNDING LLC
PO Box 2011
Warren, MI 48090-2011

Midland Funding
2365 Northside Dr
Suite 300
San Diego, CA 92108-2709

POM Recoveries
PO Box 602
Lindenhurst, NY 11757-0602

Pediatric Center
10571 Telegraph Rd.
Suite 110
Glen Allen, VA 23059-4652

(p) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Professional Bureau of Collect
P.O. Box 4157
Englewood, CO 80155-4157

Receivables Performance Mgmt
Attn: Bankruptcy
Po Box 1548
Lynnwood, WA 98046-1548

Synchrony Bank/PayPal Cr
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076-9104

Synchrony Bank/Walmart
Attn: Bankruptcy
Po Box 103104
Roswell, GA 30076-9104

TD Bank USA, N.A.
C O WEINSTEIN & RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Target
C/O Financial & Retail Services
Mailstop BT PO Box 9475
Minneapolis, MN 55440-9475

The Bureaus Inc.
650 Dundee Rd
Ste 370
Northbrook, IL 60062-2757

Virginia Department of Tax
P.O. Box 1115
Richmond, VA 23218-1115

Visa Dept Store National Bank
Attn: Bankruptcy
Po Box 8053
Mason, OH 45040-8053

Wells Fargo Auto
Po Box 29704
Phoenix, AZ 85038-9704

Wells Fargo Bank, N.A. - Wells Fargo Auto Fi
PO Box 29706
Phoenix, AZ 85038-9706

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

Rosina Denise Cook
6464 Springcrest Lane
Henrico, VA 23231-5324

Suzanne E. Wade
P.O. Box 1780
Richmond, VA 23218-1780

Focused Recovery Solutions

9701-Metropolitan Ct

Ste B

Richmond, VA 23236-0000

(d) Portfolio Recovery Associates, LLC

POB 41067

Norfolk VA 23541

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Ecmc

1 Imation Place

Bldg 2

Oakdale, MN 55128-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Wellsfargo bank n.a.

End of Label Matrix	
Mailable recipients	55
Bypassed recipients	1
Total	56